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CCINER RILEY & FRYLLING

The Bell Telephone Building 17 West Tenth Street P.O. Box 860 Erie, Pennsylvania 16512-0860 Phone (814) 453-3343 Fax (814) 454-6713

May 10, 2005

Edward J. Chiodo, Esquire 436 Boulevard of the Allies Suite 500 Pittsburgh, PA 15219-1314

RE: Estate of Rajesh Padmaraju v.

ISD Transportation Company, Inc., et al
United States District Court for the
Western District of Pennsylvania
Nos. 03-295, 03-317 and 04-34

Dear Ed:

As per our May 6, 2005 discussions regarding outstanding discovery, please find enclosed copies of the following:

- 1. My December 2, 2004 letter;
- 2. Employment authorization to be signed by Mandeep Singh;
- 3. Plaintiff's Second Supplemental Requests for Production directed to ISD;
- 4. Plaintiff's Interrogatories directed to Mandeep Singh;
- 5. Plaintiff's Requests for Production directed to Mandeep Singh.

This discovery was all served with my December 2, 2004 letter. To date, we have not received Responses and/or Answers to this discovery. Please forward your Answers, Responses and documents responsive to these Interrogatories and Requests, so we can timely file our Pre-Trial Narrative Statement on or prior to June 1, 2005.

Very truly yours,

CONNER RILEY & FRYLING

ANDREW J. CONNER

AJC/clh.

Enclosures.

EXHIBIT